I have been a licensed Amateur Radio operator for over 27 years. As an active volunteer in both HF and VHF emergency communications, I am concerned with the potential for transmission lines to act as antennas, thereby causing intereference to other users of the spectrum.

This potential problem could be compounded if BPL is expanded nationwide all at once, and consumers become accustomed to the new service before all the technical issues have been tested in reallife situations.

I recommend that the new BPL systems be phased-in:

Phase I should expand BPL service in only a few test cities that are selected on the basis of higher population densities and diversity of radio services operating locally.

During Phase I, the Commission should solicit comments from spectrum users in these cities to better determine the extent of interference problems. This would allow the Commission to anticipate issues that may arise at the national level.

Phase II would take the "lessons learned" from Phase I and apply the solutions to any problems that arose prior to implementation of expanded BPL service.

In conclusion, a Phased approach will allay concerns and obtain much more "buy-in" by stakeholders, such as myself.

Sincerely,

Alan J. Wormser